

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA)
)
v.)
)
MOHAMAD YOUSSEF HAMMOUD,)
)
Defendant.)
_____)

Case No. 3:00CR147-1-MU

DEFENDANT’S SUPPLEMENTAL SUBMISSION REGARDING MATTHEW LEVITT

For a variety of reasons, including claims of the necessity to protect classified information and Mr. Levitt’s failures of disclosure, information was not available with respect to Matthew Levitt that is highly material to his credibility, bias, and his claimed expertise with respect to Lebanon and Hezbollah. Defendant Mohamad Hammoud submits information, including excerpts from trial testimony of Matthew Levitt in a number of criminal cases in which he served as an expert for the United States Government, that reveal the following:

- Acknowledging a field study is very important, Levitt did not begin a field study until 1997. (Exhibit 1)
- Levitt has never traveled to Lebanon, so never conducted field study there. (Exhibit 2)
- Levitt does not speak or read Arabic. (Exhibit 3)
- Levitt lived in Israel for 2 ½ years. (Exhibit 1)
- Levitt worked as an intern for the Consul General of the State of Israel during graduate school, a fact he does not disclose on his curriculum vitae. (Exhibit 4) and compare (Exhibit 5).

- Mr. Levitt's employer, The Washington Institute for Near East Policy, has from its origins and throughout its history, intimate connections with pro-Israeli policy. Including AIPAC. (Exhibits 6 and 7).
- Mr. Levitt is a frequent speaker at AIPAC's and other pro-Israel events. (Exhibit 8)
- Mr. Levitt is an Orthodox Jew (Exhibit 9) who has advocated for a "theocentrism among all Jews and Israelis" with respect to politics. (Exhibit 10 at page 3 of 6) He has also written statements including: "We finally learned how to protect ourselves from a world who has been killing and plundering Jews for millennia?" (Exhibit 10 at page 2 of 6)
- Even though Mr. Levitt opined Mr. Hammoud and his co-defendants "took affirmative steps to support Hizballah and its terrorist agenda, going far beyond the realm of being good Shi'a Muslims..." (Exhibit 6 at page 2 of his opinion), he is not an expert on Middle East history, Islam or the Qur'an (Exhibit 11).
- Mr. Levitt's writing reveals a consistent bias, and specifically a bias against acknowledging legitimate social services provided by Arab organizations, including Hamas and Hezbollah. (Exhibit 12).

Respectfully submitted this the 24th day of November, 2010.

Respectfully submitted,

s/James P. McLoughlin, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2010, I caused the foregoing to be filed electronically with the Clerk of Court through ECF, and that service on the Government will be accomplished by ECF sending an e-notice of the electronic filing to the following:

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